## Case 3:08-cv-02675-EDL Document 327 Filed 07/26/10 Page 1 of 5

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2	Terry S. Sterling, Esq. (SB# 106379) SPAULDING McCULLOUGH & TANSIL LLP			
3	90 South E Street, Suite 200 P.O. Box 1867			
4	Santa Rosa, CA 95402 Telephone: (707) 524-1900 / Facsimile: (707) 524-1906			
5	spaulding@smlaw.com; sterling@smlaw.com			
6	Attorneys for Defendants SONOMA COUNTY SHERIFF'S DEPARTMENT,			
7	BILL COGBILL and COUNTY OF SONOMA			
8	UNITED STATES D	DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA			
10				
11	VALERIE GEORGE, as Administrator and	Case No.: 3:08-cv-02675-EDL		
12	Personal Representative of THE ESTATE OF RYAN GEORGE; VALERIE GEORGE and			
13	TAJMAH BEAUCHAMP, as Legal Representatives for Jaida George and Ryan	   STIPULATION AND [ <del>PROPOSED</del> ] ORDER		
14	George, Jr.; VALERIE GEORGE, Individually; DONALD GEORGE; and TAJMAH	ALLOWING DEFENDANTS COUNTY OF SONOMA, SONOMA COUNTY SHERIFF'S		
15	BEAUCHAMP, Individually,	DEPARTMENT AND BILL COGBILL TO FILE MEMORANDA OF POINTS AND		
16	Plaintiffs,	AUTHORITIES IN EXCESS OF 25 PAGES IN LENGTH		
17	vs.			
18	SONOMA COUNTY SHERIFF'S DEPARTMENT; BILL COGBILL; COUNTY	Hon. Elizabeth D. Laporte		
19	OF SONOMA; CALIFORNIA FORENSIC MEDICAL GROUP, INC.; JAMES LUDERS,			
20	M.D.; MICHAEL E. DAGEY, R.N.; SUTTER HEALTH; SUTTER MEDICAL CENTER OF			
21	SANTA ROSA; EDWARD W. HARD, M.D.; RICHARD FLINDERS, M.D.; JOSEPH N.			
22	MATEL, M.D.; NORICK JANIAN, M.D.; and DOES 1 through 25, inclusive,			
23	Defendants.			
24	Defendants.			
	Defendents COLINITY OF CONOMA CON			
25	Defendants COUNTY OF SONOMA, SONOMA COUNTY SHERIFF'S DEPARTMENT			
26	and BILL COGBILL intend to file two Motions for Summary Judgment or, in the Alternative,			
27	Partial Summary Judgment (one Motion will be filed by COUNTY OF SONOMA and SONOMA			
28	COUNTY SHERIFF'S DEPARTMENT (collective)	y, "the COUNIY") and a separate Motion will		

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1	be filed by BILL COGBILL). Plaintiffs allege ten causes of action against the COUNTY and	
2	fourteen causes of action against COGBILL. It is anticipated that the Memorandum of Points and	
3	Authorities that will be filed in support of each of the two Motions will exceed the 25 pages allowed	
4	by Local Rules 7-2(b) and 7-4(b). This additional space is necessary to fully argue the complex	
5	issues presented by the Third Amended Complaint. COUNTY and COGBILL cannot provide the	
6	Court with a full analysis of the issues subject to summary judgment or partial summary judgment,	
7	including a complete analysis of the law and facts pertaining thereto, in 25 pages. Defendants	
8	require additional space, of up to 10 additional pages for each of the two Memoranda that will be	
9	filed in support of two Motions. Therefore, pursuant to Local Rule 7-12:	
10	IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel that,	
11	subject to the Court's approval, the COUNTY and COGBILL may each file a Memorandum of	
12	Points and Authorities in support of their two separate Motions for Summary Judgment or, in the	
13	Alternative, Partial Summary Judgment (one Motion to be filed by the COUNTY and one Motion to	
14	be filed by COGBILL) of up to 35 pages in length.	
15	DATED: July 23, 2010	SANFORD, WITTELS & HEISLER LLP Attorneys for Plaintiffs
16		Auomeys for Framums
17		
18		By: /s/ Steven L. Wittels, Esq.
19		Steven E. Witters, Esq.
20	DATED: July 23, 2010	SPAULDING McCULLOUGH & TANSIL LLP Attorneys for Defendants
21		SONOMA COUNTY SHERIFF'S DEPARTMENT, BILL COGBILL and COUNTY OF SONOMA
22		BILL COODILL and COUNTY OF SOLVOWY
23		By: /s/
24		Terry S. Sterling, Esq.
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1	DATED: July 23, 2010	TRIMBLE, SHERINIAN & VARANINI Attorneys for Defendants
2 3		CALIFORNIA FORENSIC MEDICAL GROUP, INC.; JAMES LUDERS, M.D. and MICHAEL E. DAGEY, R.N.
4		
5		By: /s/ Jerome M. Varanini, Esq.
6		Jerome M. Varanini, Esq.
7	DATED: July 23, 2010	HASSARD BONNINGTON LLP
8		Attorneys for Defendants JOSEPH N. MATEL, M.D. and RICHARD
9		FLINDERS, M.D.
10		Dv. /o/
11		By: /s/ Joanna L. Storey, Esq.
12	DATED: July 23, 2010	LAFOLLETTE, JOHNSON, DEHAAS,
13		FESLER & AMES Attorneys for Defendant
14		SUTTER MEDICAL CENTER OF SANTA ROSA
15		
16		By: /s/ Larry Byron Thornton
17	DATED 1.1.22.2010	DOGACKI PREOMOLOG WERER (
18 19	DATED: July 23, 2010	ROGASKI, PREOVOLOS, WEBER & PATTERSON, LLP
20		Attorneys for Defendant NORICK JANIAN, M.D.
21		
22		By: /s/ Chester A. Rogaski, Jr., Esq.
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3:08-cv-02675-EDL

STIPULATION EXCEEDING PAGE LIMIT AND [PROPOSED] ORDER

1	FILER'S ATTESTATION	
2	Pursuant to General Order 45, section X.B regarding signatures, I hereby attest under penalty	
3	of perjury that concurrence in the filing of the document has been obtained for any signatures	
4	indicated by a "conformed" signature (/s/) within this e-filed document.	
5	DATED: July 23, 2010 SPAULDING McCULLOUGH & TANSIL LLP	
6		Attorneys for Defendants SONOMA COUNTY SHERIFF'S DEPARTMENT, BILL COGBILL and COUNTY OF SONOMA
7		BILL COGBILL and COUNT I OF SONOMA
8		Dvv. /a/
9		By: /s/ Terry S. Sterling, Esq.
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1	[PROPOSED] ORDER
2	Based on the foregoing Stipulation, and good cause appearing therefore,
3	IT IS HEREBY ORDERED:
4	Defendants COUNTY OF SONOMA and SONOMA COUNTY SHERIFF'S DEPARTMENT
5	(collectively, "the COUNTY"), and BILL COGBILL may each file a Memoranda of Points and
6	Authorities in support of their separate Motions for Summary Judgment or, in the Alternative, Partial
7	Summary Judgment (one Motion to be filed by the COUNTY and one Motion to be filed by
8	COGBILL) of up to 35 pages in length.
9	ETATES DE CO
10	Dated: July 26 , 2010 FILE VAPETH D
11	Dated: vary 20 , 2010  EL SABETH D  ULLE I IT IS SO ORDERED
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13	do Elizabeth D. Laper
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15	Judge Bar DISTRICT OF CENTRAL
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